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May 22, 2018

Dana Wilson  
Federal Communications Commission  
Consumer and Governmental Affairs Bureau  
Disability Rights Office  
445 12th Street, SW  
Washington, DC 20554

CG Docket No. 03-123

Re: New Jersey Relay Service FCC Certification Renewal Supplemental Information

Dear Ms. Wilson,

Pursuant to the Commission's request, The New Jersey Board of Public Utilities (NJBPUB) hereby supplements its previously filed TRS recertification application with the enclosed information.

I hereby certify that New Jersey Relay is in compliance to the rule sections noted in the Commissions follow up email.

If there are any questions regarding this filing, please feel free to contact me.

Thank you for your assistance in this matter.

Respectfully,

Patricia Campbell  
Board of Public Utilities  
44 South Clinton Ave, 3<sup>rd</sup> Floor  
PO Box 350  
Trenton, NJ 08625-0350  
(609) 633-9702

## **FCC Supplemental Filing**

### **64.604(a)(1)(v) Mandatory Minimum Standards**

**CAs answering and placing a ITV-based TRS or VRS call shall stay with the call for a minimum of ten minutes. CAs answering and placing an STS call shall stay with the call for a minimum of twenty minutes. The minimum time period shall begin to run when the CA reaches the called party.**

Consistent with the new requirement of 64.604(a)(1)(v), Sprint CAs answering or placing an STS call and stay with the call for a minimum of twenty minutes. Sprint is in compliance with this requirement.

### **64.606(d) Method of Funding**

**Except as provided in 64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promotes national understanding of TRS and do not offend the public.**

Communications promoting the understanding of New Jersey Relay are labeled in a consistent and respectful manner that does not offend the public. The NJBPU has not received any complaints on this subject. As such, New Jersey's Relay is in compliance with this requirement.

**64.606(b)(1)(i) requires that state TRS programs establish that they meet or exceed all operational, technical, and functional minimum standards contained in 64.604, and 64.604(d) incorporates by reference the CPNI rules, the states are required to establish that their programs comply with the CPNI rules.**

New Jersey certifies that the New Jersey's TRS program meets or exceeds all operational, technical and functional minimum standards and is in compliance with the CPNI rules.

Sprint Relay has established operating procedures that are adequate to ensure compliance with the Commission's TRS CPNI rules.

### **64.5109 TRS Customer Proprietary Network Information**

As required, Sprint files CPNI compliance certification with the FCC annually.  
See Attachment A.

## **ATTACHMENT A**

### **SPRINT'S STATEMENT OF CPNI COMPLIANCE**

Sprint Corporation ("Sprint") complies with the Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") minimum standards with respect to Sprint's role as a contractor supporting New Jersey's Telecommunications Relay Service ("TRS") program. However, per 47 C.F.R. §64.606(c)(1), it is New Jersey's responsibility to certify New Jersey's TRS program every 5 years. The following statement only explains the operating procedures established by Sprint to ensure its compliance with the CPNI rules (see 47 C.F.R. §64.5101 *et seq.*) as a contractor supporting the State TRS program for the current 5-year certification period (calendar years 2013-2017); the statement does not address New Jersey's compliance as the New Jersey TRS program administrator or the activities of any other contractors that New Jersey may use to support the TRS program. Per the FCC, New Jersey has an obligation to provide a CPNI statement to the FCC in accordance with FCC 47 C.F.R. §64.604(d) and 64.606(c)(1).

#### **Data Brokers**

As New Jersey's contractor, Sprint did not detect any pretexting activities by data brokers during the certification period.

#### **CPNI Complaints**

As New Jersey's contractor, Sprint did not receive any complaints during the certification period concerning the unauthorized release of TRS CPNI.

#### **Use, Disclosure and Access to CPNI**

As New Jersey's contractor, Sprint did not use, disclose or permit access to TRS CPNI in 2017 without complying with procedures specified in 47 C.F.R. §64.5101 *et seq.* Sprint did not use, disclose, or permit access to TRS CPNI for marketing purposes or for any other reason not authorized in 47 U.S.C. §64.5105(c).

#### **Safeguards**

As New Jersey's contractor, Sprint takes reasonable measures to discover and protect against attempts to gain unauthorized access to TRS CPNI. Consistent with Sprint's commitment to preserving customer privacy, as New Jersey's contractor, Sprint has a variety of training programs for its employees and subcontractors. The training explains how Sprint employees and subcontractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. During the certification period, all Sprint employees and all subcontractors who had access to TRS CPNI took CPNI training.

As New Jersey's contractor, Sprint also maintains a disciplinary process as part of Sprint's procedures that addresses CPNI compliance. Sprint security personnel investigate instances of potential improper access or disclosure of CPNI by employees. If the investigation indicates a violation has occurred, disciplinary action is taken, up to and including termination.

Before disclosing CPNI to subcontractors, Sprint enters into agreements with strict privacy and confidentiality provisions that require the subcontractor to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews contract terms and conditions to ensure that those provisions adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires subcontractors with which it shares CPNI to safeguard this information in a manner that is consistent with the FCC's rules and retains the right to terminate the contract in the event of a breach.

#### **Authentication**

Sprint does not currently offer users of New Jersey TRS service telephonic, online, or in-store access to TRS CPNI. Therefore, the authentication requirements in 47 C.F.R. §64.5110 are not applicable at this time with respect to Sprint's role as New Jersey's contractor.

#### **Notification of Account Changes**

Sprint provides notice to New Jersey TRS users in accordance with the FCC's requirements when a triggering event occurs that falls within scope of Sprint's responsibilities.

#### **Notification of CPNI Breaches**

In accordance with the FCC's rules, Sprint provides notice to law enforcement in the event that a breach of customer information includes CPNI. Sprint also provides notice to impacted customers after completing the process of notifying law enforcement. Such notification provides customers with enough information to understand the nature of the breach, the scope of impacted information and recommendations on how the customer should respond. If the impacted customer alerts Sprint of a potential breach, Sprint investigates the customer's allegations and communicates as necessary with the customer and/or law enforcement. Sprint did not have any breaches of New Jersey TRS CPNI during the certification period.